UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA Criminal No. 21-mi-825 BRT

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CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MOTION OF UNITED STATES FOR DETENTION WITHOUT BAIL PENDING TRIAL

CORNELIUS GRAHAM,

Defendant.

The United States of America, by and through its attorneys, Charles J. Kovats, Jr., Acting United States Attorney for the District of Minnesota, and David P. Steinkamp, Assistant United States Attorney, hereby moves for the detention of the defendant without bail pending trial on the following grounds:

- 1. Under Title 18, United States Code, Section 3142(f)(2)(A), there is a serious risk that defendant will flee.
- 2. Under Title 18, United States Code, Section 3142(F) there is no condition or combination of conditions of release in Title 18, United States Code, Section 3142(c) which will reasonably assure the safety of the community and the appearance of the defendant as required.



3. The United States also respectfully requests a three-day continuance of the detention hearing, pursuant to Title 18, United States Code, Section 3142(f).

Dated: November 10, 2021

Respectfully Submitted,

CHARLES J. KOVATS, JR. Acting United States Attorney

/s David P. Steinkamp

BY: DAVID P. STEINKAMP Assistant U.S. Attorney Attorney ID No. 178470